

EXHIBIT G



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VIA EMAIL

September 12, 2025

Re: Kadrey v. Meta Platforms, Inc., Case No. 3:23-cv-03417-VC-TSH

Counsel:

We write to provide an update on some previous requests.

We have retrieved the contents of the requested S3://fair-spark/xiaolan directory and have placed them on the source code computer for your review, and we are also producing a text file listing the files in that directory. We have recently learned that this directory contains files from an additional download of titles from the LibGen-Fiction dataset. Based on the dates of the files, this download appears to have taken place in early April 2024 and contains approximately 6,000 works downloaded from that dataset. The downloaded titles can be identified from the files (and their filenames) being produced, and based on our preliminary review, it does not appear that Plaintiffs' works are among this set of downloaded files.

Additionally, as you may recall, Meta earlier this year produced lengthy text files listing the works downloaded from Anna's Archive during the torrent download process that began in April 2024. (Meta_Kadrey_00237289, Meta_Kadrey_00237290, Meta_Kadrey_00237291.) We also produced AWS cost and usage data for six AWS EC2 instances that were utilized in the torrent download. (Meta_Kadrey_00238140, Meta_Kadrey_00238141.) We have recently learned that some of these works were downloaded using other AWS instances, beyond those six AWS EC2 instances, associated with the AWS S3 fairspark-data account. We are thus producing additional AWS cost and usage data, in the same format as the previous production, for all of the AWS instances linked to that account (excluding the six instances for which AWS data was already produced) for the same time periods previously provided. We also note our understanding that, unlike the six previously-identified AWS EC2 instances, the other instances associated with the fairspark-data account may have been used for other purposes beyond the downloading of Anna's Archive data. We are also producing, on the source code computer, a handful of additional source code files collected from Ms. Xiaolan Wang, that we understand are related to these downloads.

With respect to your question about the 2022 download, if you have any additional information that Mr. Lample used AWS to perform that download (beyond the statements in Meta_Kadrey_00237329), please let us know. We looked into Meta_Kadrey_00237329 at the time it was produced and did not identify evidence that Mr. Lample used AWS to perform the LibGen download. We have not, since producing the document, obtained information indicating that Mr. Lample used AWS to perform the LibGen download. The numerous previously-produced torrent download logs from 2022 (Meta_Kadrey_00238128), about which you questioned Mr. Christopher King, indicate that the torrent download jobs were not executed using AWS.

We are still looking into your request regarding command line and Yarn logs, but to date have not located files containing that information. We have identified some parquet files that relate to the Anna's Archive download, which we are providing on the source code computer for your review.

Cooley

September 12, 2025
Page Two

Sincerely

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